

Sewer Spill Response under the new WDR, SWRCB 2006-03

Overflow Emergency Response Plan

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WDR Overview

- Requires pro-active approach to reduce SSO's.
- Requires uniform reporting and centralized data-base
 - Creates Industry Peer-Pressure to meet standards
- WDR does not supersede Region 9 NPDES
 - Could be overlapping requirements
- **Order escalates SSO prevention by asserting the “nuisance” aspect of sewer spill as well as water quality impacts.**

WDR Overview (Cont.)

- WDR Applicability
 - All California Collection Systems > 1 mile
- Sanitary Sewer Management Plan (SSMP)
 - Asset Management Plan
 - 11 Elements
- Certified by PE
- Adopted by Agency's Governing Board

WDR Implementation Schedule

- Implementation Schedule based on population:
- Adoption date is important
- Key Milestones:
 - Nov 2, 2006, application and inclusion
 - Jan 2, 2007, on-line reporting (CIWQS)
 - May 2, 2007, SSMP development plan & schedule
SSMP Goals & Organization Chart

WDR Implementation Schedule (Cont.)

- Key Milestones:
 - Nov 2, 2008, Overflow Emergency Response Plan
Legal Authority
Operations & Maintenance Program
Fats, Oils, & Grease Control Program
 - August 2, 2009, Standard Specifications
Capital Improvement Plan
w/ System Evaluation & Capacity Assurance
Final SSMP, certified and adopted.

WDR Components

- WDR document (20 pages)
- Monitoring & Reporting Program
(5 pages)
- Fact sheet (10 pages)

SSMP Element No. 6 : Emergency Overflow Response Plan

- New Name – new requirements
- Written Plan – Stand alone document
- Requires trained & knowledgeable staff
 - staff & consultants
- 4 parts, with overlapping elements:
 1. Response
 2. Notification
 3. Impact Mitigation
 4. Reporting

#1 – Response

- **Discovery**
 - Establish Agency Contacts
- **Dispatch, Arrival, & Assessment**
 - 1 Hour Response
 - Clear internal communication procedures
- **Containment**
 - Quick, simple
 - Minimize impact to CA waters
 - Traffic Control, Crowd Control, etc

#1 – Response (Cont.)

- Correction
 - Clear blockage, restore power, commence by-pass, etc.
- Documentation
 - Easy to use check sheets, forms, and maps
 - Cameras, GPS, sampling kits

#2 - Notification

- Not to be confused w/ Reporting
- Office of Emergency Services (800.825.7550)
 - *if spill 1000 gals or more - as soon as possible - OES #*
- SD County Health (and Lifeguards)
 - *Posting and sampling protocols*
- Regional Water Quality Control Board
 - *as soon as possible - 96-04 reports*

#2 – Notification (Cont.)

- Public
 - Agency Hierarchy, public at large, etc
- Fish & Game, US Fish & Wildlife
 - Wetlands, sensitive habitat, protected species issues
- Other:
 - Storm water agency
 - Source control agency
 - Applicable Utilities, Fire, Police, Etc
 - Dig Alert

#3 – Impact Mitigation

- Secondary Containment
- Clean-up
 - special considerations for wetlands and protected species
- Recovery
 - Including wash water
 - Volume should be estimated/measured
- Sampling
 - Enterococci, Total & Fecal Coliform
 - Could include DO, TSS, VSS, pH, turbidity, Oil & Grease

#3 – Impact Mitigation (cont.)

- Investigation
 - Spill Volume Estimate
 - Debriefs
 - CCTV Inspection
 - Review & Recommendations
- Adoption & Implementation of Corrective Actions
 - *Prevent re-occurrence*
 - Updated procedures and inventory of critical parts
 - TRAINING
 - SSMP Monitoring Measurement & Program Modifications
 - SSMP Audits

#4 - Reporting

- 3 Categories of spills
 - Category 1 (1000 gals or reaches surface waters)
 - Initial report with 3 business days
 - Final certified report within 15 calendar days of SSO conclusion
 - Most information fields (Lat & Long w/ deg and min to 3 decimal places)
 - Category 2 (all other collection system overflows)
 - Final certified report due before end of following month
 - About 12 information items

#4 – Reporting (Cont.)

- Private Laterals
 - Same as Category 2 plus responsible party contact information
- No Spills
 - Final certified report due before end of following month

#4 – Reporting (Cont.)

- Statewide electronic water quality database
 - Application by “certifying” principal executive officer
- CIWQS – California Water Quality Information System
 - Requires Collection System Questionnaire, updated annually

Additional Considerations

- Records
 - WDR requires individual and comprehensive SSO record
 - Maintained for 5 years
- Planning
 - Partnership with regulators, other utilities
 - Review system within a GIS context
- Practice
 - Test and validate for adequacy & accountability
 - Importance of SSO volume calculation/estimation
 - Provides additional opportunity for input
- Support

Questions for Leo or Others ?????

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